REMARKS

This communication is responsive to the Office Action mailed July 12, 2005.

The Office Action first reports needed corrections in some of the figures. Submitted herewith are replacement sheets for FIGS. 12 and 14. FIG. 12 has been amended to include reference number 301. FIG. 14 has been amended to include reference number 305. Each of these reference numbers are provided in the specification as noted in the Office Action.

The Office Action next reports that claims 1, 20, 21 and 26 were objected to for language used therein. With this Amendment, these claims have been corrected. Additional dependent claims from claim 1 have been amended to provide proper antecedent basis for "input speech data", while other changes have been made to improve understanding and not in view of any prior art unless discussed below. Withdrawal of the objection and approval of the amended claims is respectfully requested.

The Office Action reports that claim 1 was rejected as being obvious over Barclay (U.S. 5,960,399) in view of Brown (U.S. 6,587,822).

Barclay is cited for disclosing a server/client system for processing speech data comprising a web server, a client device and a recognition server, but it is acknowledged that Barclay does not disclose a second client device configured to record speech data and adapted to send speech data to the recognition server, wherein the second client device comprises a telephone and a voice browser. Brown is cited for disclosing such a device.

Applicant respectfully disagrees that the cited combination of Barclay and Brown teach the invention recited by claim 1 as herein amended. Brown teaches a web-based IVR platform 102 adapted to receive input from a user using a device 108 that

can be a telephone in order to access and render websites from servers 106-1 through 106-N. The web-based IVR platform 102 includes a speech recognizer 122 for performing speech recognition from the user and a text-to-speech synthesizer 116 used to render the website pages audibly to the user through the device 108. The device 108 is connected to the web-based IVR platform 102 through network 109, while the web-based IVR platform 102 is connected to servers 106-1 – 106-N through network 104. Brown appears very similar to the VoiceXML discussed in the Background Section of the application.

The components summarized above and described in Brown are somewhat similar to phone 80, connections 208 and 210, telephone voice browser 212, network 205 and server 202 of the present application in a broad sense. However, there is at least one important and patentably distinguishing difference between the teachings of Brown (and Barclay when taken in combination) and the system recited in claim 1. Specifically, claim 1 recites that the recognizer is remote from both of the client devices (which are different from each other), but serves each of the client devices. (This is supported in the specification, for instance, at least page 13, lines 7-10.)

In this manner, a single recognition server can support both devices even though the devices are different. As recited in amended claim 1, the first client device provides visual rendering, while the second client device provides audible rendering. Barclay and Brown taken alone or in combination do not teach the system of claim 1. Barclay simply lacks a second client device with the features of claim 1. However, Brown describes a system where the web-based IVR platform 102 includes both a browser 110 and a speech recognizer 122 (see FIG. 2 and column 3, lines 29-34 of Brown). Moreover, the web-based platform 102 communicates with the audio device 108 be receiving audible speech/DTMF and returning audible speech/audio playback. Brown

simply does not teach a speech recognizer for returning speech to a visually rendering client device in addition to the audible only device 108. Therefore, the combination of Barclay and Brown would necessitate a system with two recognizers, each recognizer serving a different type of client device.

In view of the foregoing, amended claim 1 is believed allowable. Dependent claims 8, 9 and 14-25 depend directly or indirectly from claim 1 and are believed separately patentable.

Claim 26 was also rejected based on the combination of Barclay and Brown. Claim 26 has been amended in a manner similar to claim 1; however, the input data from the device is not limited to speech data. Nevertheless, the reasons provided above for allowance of claim 1 are applicable to claim 26 and are herein incorporated by reference. Accordingly, claim 26 is believed allowable and dependent claims 27-30 are believed separately patentable, and thus, also allowable.

Likewise, for the reasons discussed with respect to amended claims 1 and 26, amended claim 34, which recites a method for processing input data in a client/server system, is believed allowable, while dependent claims 36-39 are believed separately patentable and allowable.

An extension of time is hereby requested for consideration of this Amendment. A charge authorization is included herewith for the extension of time fee.

In view of the foregoing, reconsideration of the application as amended is requested. Favorable action upon all pending claims is solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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## IN THE DRAWINGS

Please replace sheets 14 and 16 with the corresponding replacement sheets herein provided.